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10 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY PRODUCTS
13 LIABILITY LITIGATION

14 This Document Relates To:

15 *Tucson Unified School District v. Meta Platforms,*
16 *Inc., et al.*

17 Case No. 4:24-cv-1382
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19
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23

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**DECLARATION OF AUSTIN
BRANE IN SUPPORT OF TUCSON
UNIFIED SCHOOL DISTRICT'S
RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT (SD MSJ
NO. 2)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026

Time: 8:00 AM

Place: Courtroom 1, 4th Floor

24 I, Austin Brane, declare under penalty of perjury:

25 1. I am an attorney duly admitted to practice law in the State of California and this
26 Court. I am a Partner with the law firm Wagstaff & Cartmell LLP and am counsel for the Plaintiff
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1 Tucson Unified School District (“TUSD”). I have personal knowledge of the facts stated in this
2 Declaration, and if called upon to do so, could and would competently testify thereto.

3 2. I submit this Declaration in support of Tucson Unified School District’s Response
4 in Opposition to Defendants’ Motion for Summary Judgment (SD MSJ No. 2) (“Motion”), filed
5 concurrently with this Declaration.
6

7 3. Attached as Exhibit 1 is a true and correct copy of the transcript of the May 8, 2025,
8 deposition of Dr. Gabriel Trujillo.

9 4. Attached as Exhibit 2 is a true and correct copy of the transcript of the April 9,
10 2025, 30(b)(6) deposition of Julie Shivanonda.

11 5. Attached as Exhibit 3 is a true and correct copy of the Declaration of Julie
12 Shivanonda, dated May 13, 2025.
13

14 6. Attached as Exhibit 4 is a true and correct copy of the transcript of the April 8,
15 2025, 30(b)(6) deposition of Julie Shivanonda.

16 7. Attached as Exhibit 5 is a true and correct copy of the transcript of the September
17 17, 2025, deposition of Clarinda Rubio.
18

19 8. Attached as Exhibit 6 is a true and correct copy of an email from James Palacios to
20 Holly Leman Hammel, and attachment, dated January 9, 2019.

21 9. Attached as Exhibit 7 is a true and correct copy of an email chain, the last email
22 from Nathaly Santin to Gabriel Trujillo, dated August 7, 2022.
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24 10. Attached as Exhibit 8 is a true and correct copy of the transcript of the May 7, 2025,
25 deposition of Rebecca Carrier.
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1 11. Attached as Exhibit 9 is a true and correct copy of an excel spreadsheet produced
2 in this litigation as SM_TUSD_00365959, showing aggregate data of documented incidents of
3 student discipline from TUSD's Synergy database.

4 12. Attached as Exhibit 10 is a true and correct copy of the Declaration of Holly
5 Hammel, dated May 13, 2025.
6

7 13. Attached as Exhibit 11 is a true and correct copy of Exhibit 12 to the April 22, 2025,
8 deposition of Dr. Joseph Gaw, showing Tucson Unified School District Health Conditions Totals
9 from school years 2014-15 through 2023-24.

10 14. Attached as Exhibit 12 is a true and correct copy of an excel spreadsheet produced
11 in this litigation as SM_TUSD_00600418, showing the results of limited key word searching in
12 TUSD's Cyrun database, which is utilized by TUSD's school police.

13 15. Attached as Exhibit 13 is a true and correct copy of the transcript of the May 14,
14 2025, deposition of Brian Lambert.
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16 16. Attached as Exhibit 14 is a true and correct copy of the transcript of the May 13,
17 2025, deposition of Anna Schwartz Warmbrand.
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19 17. Attached as Exhibit 15 is a true and correct copy of the transcript of the June 24,
20 2025, deposition of Holly Hammel.

21 18. Attached as Exhibit 16 is a true and correct copy of TUSD's Second Amended
22 Answers to Defendants' Interrogatories to Tucson Unified School District (Set 3), dated May 16,
23 2025.
24

25 19. Attached as Exhibit 17 is a true and correct copy of the transcript of the June 30,
26 2025, deposition of Julie Shivanonda.
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1 20. Attached as Exhibit 18 is a true and correct copy of the Declaration of Dr. Sabrina
2 Salmon, dated May 13, 2025.

3 21. Attached as Exhibit 19 is a true and correct copy of the transcript of the May 23,
4 2025, deposition of Dr. Sabrina Salmon.

5 22. Attached as Exhibit 20 is a true and correct copy of the Declaration of Brian
6 Lambert, dated May 12, 2025.

7 23. Attached as Exhibit 21 is a true and correct copy of the transcript of the July 1,
8 2025, deposition of Brian Lambert.

9 24. Attached as Exhibit 22 is a true and correct copy of the expert report of Robert L.
10 Klein, dated May 18, 2025.

11 25. Attached as Exhibit 23 is a true and correct copy of the Expert Report of Dr. Bryce
12 Ward, Tucson Unified School District, dated May 19, 2025.

13 26. Attached as Exhibit 24 is a true and correct copy of an invoice from Yondr to
14 Tucson High Magnet School.

15 27. Attached as Exhibit 25 is a true and correct copy of the transcript of the July 14,
16 2025, deposition of Robert Ross.

17 28. Attached as Exhibit 26 is a true and correct copy of a purchase order from Amazon
18 Capital Services, Inc., to Sabino High School, dated June 11, 2024.

19 29. Attached as Exhibit 27 is a true and correct copy of an email chain, the last email
20 from Julie Shivanonda to Jon Lansa, dated April 11, 2022.

21 30. Attached as Exhibit 28 is a true and correct copy of the Expert Report of Dr. Sharon
22 Hoover, dated May 16, 2025.

1 31. Attached as Exhibit 29 is a true and correct copy of the Amended Expert Report of
2 Dr. Sharon A Hoover for Tucson Unified School District, dated June 20, 2025.

3 32. Attached as Exhibit 30 is a true and correct copy of the expert report of Jeffrey E.
4 Meyers, dated May 19, 2025.

5 33. Attached as Exhibit 31 is a true and correct copy of the declaration of Julie
6 Shivanonda, dated November 1, 2025.

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and accurate.

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10 DATED: November 7, 2025

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13 BY: /s/ Austin Brane
14 Austin Brane